

# **EXHIBIT 2**

**From:** [Katz, Jennifer](#)  
**To:** [Cary Hansel](#)  
**Cc:** [Scott, Robert](#); [Sweeney, John P.](#); [Woodward, Sky](#)  
**Subject:** RE: Responses to discovery in MSI v. Hogan  
**Date:** Friday, January 12, 2018 12:58:00 PM

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Thank you, Cary. Yes, Monday, January 22 is acceptable.

Best,  
Jennifer

Jennifer Katz  
Assistant Attorney General, Civil Division  
Office of the Attorney General  
200 Saint Paul Place, 20<sup>th</sup> Floor  
Baltimore, Maryland 21202  
[jkatz@oag.state.md.us](mailto:jkatz@oag.state.md.us)  
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**From:** Cary Hansel [<mailto:Cary@hansellaw.com>]  
**Sent:** Friday, January 12, 2018 12:56 PM  
**To:** Katz, Jennifer <[jkatz@oag.state.md.us](mailto:jkatz@oag.state.md.us)>  
**Cc:** Scott, Robert <[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)>; Sweeney, John P. <[JSweeney@bradley.com](mailto:JSweeney@bradley.com)>; Woodward, Sky <[SWoodward@bradley.com](mailto:SWoodward@bradley.com)>  
**Subject:** RE: Responses to discovery in MSI v. Hogan

I believe that the additional days we have requested will allow the time necessary to appropriately answer discovery. If I only intended on producing boilerplate objections with no substance, I wouldn't need an extension and I could have those to you this afternoon.

I believe that I can have everything to you by Monday the 22<sup>nd</sup>, which is a little earlier than my prior estimate.

Please confirm whether or not the 22<sup>nd</sup> is acceptable. If it is not, I will file a motion seeking the

additional time. If it acceptable, I will have appropriately substantive responses to you then.

Cary

CARY J. HANSEL  
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**From:** Katz, Jennifer [<mailto:jkatz@oag.state.md.us>]

**Sent:** Friday, January 12, 2018 12:45 PM

**To:** Cary Hansel <[Cary@hansellaw.com](mailto:Cary@hansellaw.com)>

**Cc:** Scott, Robert <[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)>; Sweeney, John P. <[JSweeney@bradley.com](mailto:JSweeney@bradley.com)>;

Woodward, Sky <[SWoodward@bradley.com](mailto:SWoodward@bradley.com)>

**Subject:** RE: Responses to discovery in MSI v. Hogan

Cary,

As a general rule, we are amenable to reasonable extensions of time, which was why we agreed to Plaintiffs' request for an additional 30 days to respond to our discovery. At this point, your clients have had 2 1/2 months to respond. Given the rapidly approaching discovery deadline of March 30, we are concerned that further extensions will prejudice defendants ability to complete discovery prior to expiration of the discovery deadline. This concern is heightened by the fact that we received boilerplate objections and virtually no substantive information in response to most our discovery requests to Atlantic Guns. If your clients are intending to take the same approach, we need to know that now as opposed to January 25.

Best,  
Jennifer

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**From:** Cary Hansel [<mailto:Cary@hansellaw.com>]

**Sent:** Thursday, January 11, 2018 7:10 PM

**To:** Katz, Jennifer <[jkatz@oag.state.md.us](mailto:jkatz@oag.state.md.us)>

**Cc:** Scott, Robert <[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)>; Sweeney, John P. <[JSweeney@bradley.com](mailto:JSweeney@bradley.com)>; Woodward, Sky <[SWoodward@bradley.com](mailto:SWoodward@bradley.com)>

**Subject:** RE: Responses to discovery in MSI v. Hogan

Thank you for the reminder, Jennifer.

As you know, the holidays have intervened between the service of your requests and now and the judge just signed the confidentiality order, pursuant to which certain of our responses will be produced, on January 3.

Under the circumstances, are you able to consent to our providing responses on January 25<sup>th</sup>?

Best regards,

Cary

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**From:** Katz, Jennifer [<mailto:jkatz@oag.state.md.us>]  
**Sent:** Tuesday, January 9, 2018 3:12 PM  
**To:** Cary Hansel <[Cary@hansellaw.com](mailto:Cary@hansellaw.com)>  
**Cc:** Scott, Robert <[rscott@oag.state.md.us](mailto:rscott@oag.state.md.us)>; Sweeney, John P. <[JSweeney@bradley.com](mailto:JSweeney@bradley.com)>;  
Woodward, Sky <[SWoodward@bradley.com](mailto:SWoodward@bradley.com)>  
**Subject:** Responses to discovery in MSI v. Hogan

Cary,

The responses to discovery served on your clients in this case are overdue. Please serve them as soon as possible and no later than this Friday, January 12, 2018.

Best,  
Jennifer

Jennifer Katz  
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